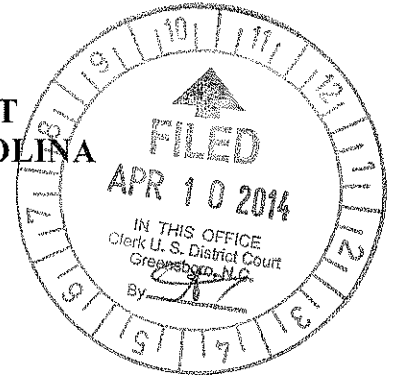


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



In Re: Subpoena Issued to Volvo Group  
North America, LLC.

-- in --

DARRELL CANADA, individually and  
on Behalf of all Others Similarly  
Situating,

Plaintiff,

vs.

DOMINION ENTERPRISES, a Virginia  
General Partnership, CROSS-SELL,  
LLC and JOHN DOES 1-100,

Defendants.

No. 14MC24  
(Underlying action pending in the  
Eastern District of Arkansas; Case No.  
4:13CV00345 JLH)

VOLVO GROUP NORTH AMERICA, LLC'S  
MOTION TO QUASH

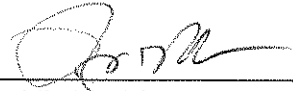
Non-party Volvo Group North America, LLC. ("Volvo"), by and through counsel and pursuant to Rule 45(d) of the Federal Rules of Civil Procedure and Local Rule 7.3, hereby moves this Court for an order quashing a subpoena issued by Plaintiff Darrell Canada ("Plaintiff"). The subpoena commands Volvo to designate corporate representatives and appear on April 17, 2014, for deposition at Emerson Poynter, LLP, 1301 Scott Street, Little Rock, AR 72202. The subpoena was not accompanied by a 30(b)(6) deposition notice. A true copy of the subpoena is attached hereto as Exhibit 1.

In support of this motion, Volvo submits the accompanying Memorandum of Law. Pursuant to Rule 45(d) of the Federal Rules of Civil Procedure, the subpoena should be

quashed because (1) service was not accompanied by the tender of attendance and mileage fees; (2) it fails to allow a reasonable time for Volvo to comply and designate corporate representative(s); (3) it requires Volvo to comply beyond the geographical limits specified in Rule 45(c); (4) it subjects Volvo to undue burden.

WHEREFORE, Volvo respectfully requests that this Court quash the subpoena issued by Plaintiff and grant such other relief as the court may deem appropriate.

This the 19 day of April, 2014.



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## CERTIFICATE OF SERVICE

It is hereby certified that the foregoing *Motion to Quash* has been served on counsel for the parties via first class U.S. mail, addressed as follows:

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### *ATTORNEYS FOR DEFENDANTS*

This the 10 day of April, 2014.



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